

BAKER, LESHKO, SALINE & BLOSSER, LLP

Attorneys for Plaintiff

One North Lexington Avenue
White Plains, New York 10601
Mitchell J. Baker (MB-4339)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER LUNDGREN,

Plaintiff,

07 Civ. 4534 (WP4)

-against-

SEAN G. JULIUS, SHARON L. DAVIS,
LICARE CORPORATION d/b/a
VACCARO'S WINE & SPIRITS, and
JOHN DOES 1-10,

Defendants.

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S I R S:

PLEASE TAKE NOTICE that plaintiff Jennifer Lundgren hereby discloses
the following expert information and testimony pursuant to Federal Rules of Civil
Procedure 26(2):

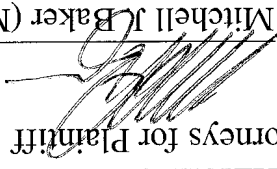
A. Plaintiff expects to call as an expert witness Dr. Herbert L. Hermele,
MD, FACS, Orthopaedic Specialty Group, PC, 75 Kings Highway Cutoff,
Fairfield, CT 06824, telephone 203.337.2600, fax 203.337.2644.

B. Annexed hereto as Exhibit "A" is a copy of the report of Dr. Hermele. He will testify that Ms. Lundgren has three injuries which were caused by the automobile accident at issue: (1) the disease at L4-L5 of her spine has been exacerbated by the automobile accident; (2) she has chondromalacia patella, patellofemoral syndrome in her left knee; at the present time certain injections are being tried; however, if this is not successful, she was require surgery of the left knee to further investigation and/or debridement; and (3) there is a possibility that she will develop posttraumatic osteoarthritis of her hip.

C. Dr. Heremele has not yet advised us of his fee for deposition testimony or trial testimony. His fee for preparation of the report was \$500.00.

Dated: White Plains, New York
May 9, 2008

Yours, etc.

BAKER LESHKO SALINE & BLOSSER, LLP
Attorneys for Plaintiff
By: 

Mitchell J. Baker (MB-4339)
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914.681.9500

Exhibit "A"

[REPORT]

ORTHOPAEDIC SPECIALTY GROUP, P.C.
 75 KINGS HIGHWAY CUTOFF, FAIRFIELD CT 06824
 2909 MAIN STREET, STRATFORD CT 06614
 2 ENTERPRISE DRIVE SUITE 204, SHELTON CT 06484

D.O.B: 04/30/81

ACCT: 933747

NAME: Lundgren, Jennifer

DOS: 04/29/08 FO

DIAGNOSES:

1. Chondromalacia patella, patellofemoral syndrome left knee.
2. Degenerative lumbar disc syndrome.
3. Status post dislocation left hip.

SUBJECTIVE: Same. No better, no worse.**OBJECTIVE:** Also unchanged.**PLAN:** I have gone over in detail all of the issues.

The MRI of the knee shows chondromalacia patella and a focus of chondromalacia of the medial femoral condyle. All of this fits the clinical picture. Likewise fits the story of blunt trauma in the motor vehicle accident.

Options of treatment discussed. She elects injection.

Under usual precautions skin anesthesia uneventfully, left knee was injected with dilute solution Marcaine, Kenalog. 40 of Kenalog. Post injection protocols.

We will hear from her by phone with response to this.

Other options include an arthroscopic evaluation and debridement.

As far as her left hip, the MRI just done shows normal appearing hip, no posttraumatic changes, no avascular necrosis.

Certainly for the time being no further treatment in this direction. Possibility of developing posttraumatic osteoarthritis of the hip down the road exists.

Incidentally noted at the time of the MR of the hip was ongoing degenerative disease at the 4-5 level of the lumbar spine. This was also known to us. This was compared to the prior study of 2005 and it has progressed. We have talked to her previously about interventional pain management for this. This was again discussed, she will give this some thought.

We will hear from her by phone.

Hernle/ss

cc: Attorney Mitchell Baker
Fax 914 681 9505